

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

GLORIA EATON, individually and on behalf of all others similarly situated,	)	CASE NO: 1:22-cv-00917-VMC
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE LITIGATION PRACTICE	)	
GROUP, PC,	)	
	)	
Defendant.	)	

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**CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO  
RESPOND TO SECOND AMENDED COMPLAINT**

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COME NOW, Plaintiff Gloria Eaton and Defendant The Litigation Practice Group, P.C., and file this, their Consent Motion for Extension of Time for Defendant to Respond to Plaintiff's Second Amended Complaint, and show this Honorable Court the following:

Plaintiff filed her Class Action Complaint for Damages on January 28, 2022 in the DeKalb County State Court. Defendant timely removed the action to this Court on March 4, 2022. Defendant filed its first Motion to Dismiss on March 11,

2022. Plaintiff then amended her Complaint pursuant to Fed. R. Civ. P. 15 (a) (1) (A) on March 12, 2022 thereby mooted Defendant's First Motion to Dismiss. Defendant renewed its Motion to Dismiss on March 25, 2022. Defendant's Motion to Dismiss was denied by the Court on November 3, 2022, and the Second Amended Complaint was also filed on November 3, 2022.

Defendant has requested, and Plaintiff has consented, to an extension to December 1, 2022 for Defendant to respond to the Second Amended Complaint. This request is not imposed for delay. Defendant shows the Court that the Defendant's local counsel is out of town during the week of November 14 and the following week is the Thanksgiving holiday, and no prejudice shall arise from the extension to December 1.

Respectfully submitted, this 10<sup>th</sup> day of November, 2022.

SIGNATURES ON FOLLOWING PAGE

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LOCAL RULE 5.1 CERTIFICATION

I hereby certify that this Consent Motion has been prepared with the font type and margin requirements of Times New Roman, 14-point font, in accordance with Local Rule 5.1.

Respectfully submitted, this 10<sup>th</sup> day of November, 2022

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically filed on November 10, 2022, via the Court's CM/ECF system, which will provide notice to Plaintiff's counsel.

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